

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF INDIANA  
Indianapolis Division

KIRK LONAS,	)	
	)	
Plaintiff,	)	
	)	Case No. 1:24-cv-00996-RLY-MG
v.	)	
	)	
BRAD BURKHART,	)	
OFFICER JARVIS,	)	
SERGEANT AARON DAVIS,	)	
CAPTAIN BRIDGETTE FOY, and	)	
JEREMY T. FERRELL,	)	
	)	
Defendants.	)	

**HANCOCK COUNTY DEFENDANTS'  
PRELIMINARY WITNESS AND EXHIBIT LISTS**

**I. WITNESSES**

Defendants, Brad Burkhart, Officer Jarvis, Sergeant Aaron Davis, and Captain Bridgette Foy, ("Hancock County Sheriff Defendants"), by counsel, identify the following witnesses who may be called to testify at trial:

1. Plaintiff Kirk Lonas.
2. Representatives and/or employees of the Hancock County Sheriff's Office, 398 Malcolm Grass Way, Greenfield, Indiana 46140, including:
  - a. Sheriff Brad Burkhart
  - b. Officer Jarvis
  - c. Sergeant Aaron Davis
  - d. Captain Bridgette Foy
  - e. Other individuals who have yet to be identified
3. Defendant Jeremy T. Ferrell.

4. Any and all health care or medical providers with whom Plaintiff has treated or consulted at any time, either before or after the incident(s).
5. All persons deposed or yet to be deposed in this case.
6. All persons identified through the discovery process, which is ongoing.
7. Witnesses to authenticate and/or lay the foundation for the admission of exhibits to be used at trial.
8. Custodians of business records to be used at trial.
9. Any witnesses necessary for impeachment and/or rebuttal.
10. Any witness listed by Plaintiffs on any witness list they may file.

## **II. EXHIBITS**

The Hancock County Sheriff Defendants, by counsel, identify the following exhibits which may be introduced as evidence at trial:

1. Plaintiff's complete jail file.
2. All pleadings and motions filed in this matter, along with any and all exhibits attached thereto.
3. All correspondence to or from any of the parties to this matter.
4. All documents identified in the parties' responses to written discovery in this matter.
5. Video interviews of Plaintiff, James Sachs, and Jeremy Ferrell following the incident at issue.
6. Documents from or related to the matter of *State v. Jeremy Ferrell*, Case 30D01-2209-F3-001552.
7. Any document produced in discovery.

8. Any other exhibit which is identified through further discovery, including but not limited to responses to non-party requests for production.
9. All depositions and exhibits introduced and/or discussed in said depositions.
10. Any exhibit listed by Plaintiff on any exhibit list he may file.

Respectfully submitted,

**TRAVELERS STAFF COUNSEL INDIANA**

By: /s/ Daniel M. Witte

Daniel M. Witte, 18957-49

### **CERTIFICATE OF SERVICE**

I hereby certify that the foregoing document was filed electronically using the Case Management/Electronic Case Files ("CM/ECF") system and served via regular U.S. mail, postage pre-paid, upon the following person(s) on **July 25, 2025**:

Kirk Lonas  
DOC# 296263  
New Castle Correctional Facility  
P. O. Box A  
1000 Van Nuys Road  
New Castle, IN 47362

By: /s/ Daniel M. Witte

Daniel M. Witte, 18957-49

TRAVELERS STAFF COUNSEL INDIANA  
501 Pennsylvania Parkway, Suite 310, Indianapolis, IN 46280  
**Mailing Address:** P. O. Box 64093, St. Paul, MN 55164-0093  
(317) 818-5121  
[dwitte@travelers.com](mailto:dwitte@travelers.com)

DMW:gb